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June 4, 2008

Our File No. 21949-00100-63

**VIA HAND DELIVERY**

Monica Desai, Chief  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: **GUAM CABLEVISION, LLC**  
***Supplement to Request For Modification of Waiver***  
CSR-7193-Z  
CS Docket No. 97-80

Dear Ms. Desai,

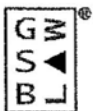
This letter is written on behalf of Guam Cablevision, LLC ("GCL"), concerning its pending request filed July 12, 2007 ("Request"), for modification of the waiver of the set-top integration ban set forth in Section 76.1204(a)(1) of the Commission's rules, which was previously granted GCL on June 29, 2007, by Memorandum Opinion and Order, DA 07-2917.

The Commission found that GCL's commitment to upgrade its system and its exposure to devastation caused by multiple natural disasters over the past ten years has left GCL in an extraordinary situation. It found that good cause exists for a limited waiver of the integration ban until December 31, 2009. The waiver was granted for the Scientific Atlanta Explorer 1850 set-top box.

The Request asks that the GCL waiver be extended to the Scientific Atlanta Explorer 2200, a successor model to the 1850, and to the Explorer 8300 DVR. The purpose of the integration ban is to promote consumer choice in the availability of navigation devices. However, Guam and its retail market are too small to promote such devices.<sup>1</sup> The integration ban therefore has no benefit to consumers in Guam, and denial of the Request would neither further nor frustrate the purposes of Section 629 of the Act.

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<sup>1</sup> Moreover, TiVo is not available in Guam because it does not support an IPG (interactive programming guide) for the Guam time zone. A subscriber that brought a TiVo device to Guam would have no way to program it.



G A R V E Y S C H U B E R T B A R E R

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Since the Request was filed, GCL has depleted its inventory of Explorer 8300 DVR units. It is unable at the present time to meet consumer demand without ordering additional equipment. There is, accordingly, a compelling need for the Commission to consider and to act favorably on the Request at the earliest practicable time.

Accordingly, GCL renews and reiterates its request that the Commission modify the waiver previously granted GCL. Such modification is warranted and justified under Sections 76.7 and 76.1207 of the Commission's rules.

Kindly communicate any questions directly to this office.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John Wells King', written over the typed name.

John Wells King